



THE CITY OF NEW YORK  
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October 9, 2024

**VIA ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

Re: SeanPaul Reyes v. City of New York, 23 Civ. 6369 (JGLC)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. The parties write jointly to respectfully request that their time be extended to submit a revised case management order from October 15, 2024 to November 29, 2024, and that discovery be stayed during that period of time. The reason for the request is that the Second Circuit Court of Appeals yesterday set oral argument on the City's appeal of this Court's preliminary injunction order for November 13, 2024. Both sides agree that the Second Circuit's decision on the City's appeal of this Court's preliminary injunction order may impact the scope of the remaining discovery to be taken in the case. Further, the Second Circuit's decision may impact the possibility of any negotiated resolution of this case, which is another topic that the Court's Case Management Order requires to be addressed. Thus, the parties jointly respectfully request that in the interest of judicial economy and the preservation of the parties' resources, that the parties' time to submit a revised case management order be extended to November 29, 2024 and that discovery be stayed during that time frame.

This is the first such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman  
Senior Counsel

cc: All Counsel (via ECF)